

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALIANZA AMERICA, YANET DOE,
PABLO DOE, and JESUS DOE, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of
Florida, in his personal capacity;
LAWRENCE A. KEEFE, Florida Public
Safety Czar, in his personal capacity; JAMES
UTHMEIER, Chief of Staff to Florida
Governor, in his personal capacity; JAMES
MONTGOMERIE; PERLA HUERTA; and
VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No.
1:22-cv-11550-ADB

AFFIDAVIT OF JAMES MONTGOMERIE

I, James Montgomerie, being duly sworn, deposes and says:

1. I am over the age of 18 years and have personal knowledge of the facts set forth in this Affidavit, which are true and correct to the best of my knowledge and belief.
2. I am a resident of the state of Florida.
3. I serve as the Chief Executive Officer of Vertol Systems Company, Inc., which is a defendant in the above-captioned action.
4. I own no property in the Commonwealth of Massachusetts ("Massachusetts"), and have never had any telephone listings, mailing addresses, or bank accounts in Massachusetts.
5. I do not conduct any regular business in Massachusetts, nor do I perform any character of work in Massachusetts.

6. I did not take any action to create or distribute any folder or brochure representing benefits that might be available to the individual plaintiffs or the putative class members upon their arrival in Massachusetts as alleged in the Second Amended Complaint.

7. I did not pay for or otherwise arrange for Vertol to pay for Vertol's use of the Martha's Vineyard airport as alleged in the Second Amended Complaint.

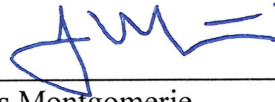
8. I did not pay for or otherwise arrange for the hiring of vans that transported the individual plaintiffs or the putative class members in this action from the Martha's Vineyard airport as alleged in the Second Amended Complaint.

9. I did not take any action to hire any video crew that filmed the individual plaintiffs or the putative class members upon their arrival at the Martha's Vineyard airport as alleged in the Second Amended Complaint.

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Date: September 9, 2024

Respectfully submitted,



James Montgomerie

STATE OF Florida

COUNTY OF Okaloosa

Subscribed and sworn before me this 9th day of September, 2024


Notary Public

